



United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

June 26, 2025

**VIA ECF**

Honorable Arun Subramanian  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

**Re: *American Federation of Teachers, AFL-CIO, et al. v. Goldstein, et al.*,  
No. 25 Civ. 03072 (AS)**

Dear Judge Subramanian:

This Office represents Gregory Goldstein, in his official capacity as Acting Director of the Federal Mediation and Conciliation Service ("FMCS"), the United States of America, the United States Office of Management and Budget ("OMB"), and Russell T. Vought, in his official capacity as the Director of the OMB (collectively, "Defendants") in the above-referenced action, in which Plaintiffs seek to enjoin the continued implementation of Executive Order 14,238 with respect to FMCS. We write respectfully to request a 14-day extension of time, from June 30, 2025, to July 14, 2025, to respond to the Amended Complaint filed by Plaintiffs on June 16, 2025. The Government makes this request in order to have sufficient time to prepare a response to the Amended Complaint and to discuss it with Defendants. Plaintiffs consent to this requested extension of time.

We thank the Court for its consideration of this request.

Respectfully submitted,

JAY CLAYTON  
United States Attorney

By: /s/ Lawrence H. Fogelman  
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cc: Elizabeth Oppenheimer  
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SO ORDERED.

A handwritten signature in blue ink, appearing to read "Arun Subramanian".

Arun Subramanian, U.S.D.J.  
Date: June 30, 2025

*Counsel for Plaintiffs*  
(VIA ECF)